



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

December 9, 2003

Mr. Wendell Sloan, Jr.
flexcel-Santa Claus
Highway 162
Santa Claus, Indiana 47579

Re: 147-18166-00044
Permit Review Request

Dear Mr. Sloan:

The flexcel - Santa Claus facility was issued a Part 70 operating permit (T147-6474-00044) on March 8, 2001 for a wood furniture manufacturing plant, located at Highway 162, Santa Claus, Indiana 47579. On November 6, 2003, the Office of Air Quality (OAQ) received a letter from flexcel - Santa Claus requesting a review of the permitting level for adding a plastic production line and plastic coating operations to their existing plant.

The source stated that this construction project consists of the addition of a molded polyurethane plastic manufacturing process and utilizing the existing wood coating booths for a plastic coating process. The potential to emit from the polyurethane plastic manufacturing process is expected to be negligible. The potential to emit VOC from the plastic coating process is expected to be less than 40 tons/yr. In addition, the plastic products being produced are not components of wood furniture.

The existing source is a HAP major source and is subject to the National Emission Standards for Hazardous Pollutants (NESHAP) for Wood Furniture (40 CFR 63, Subpart JJ). If the manufactured plastic parts are not components for wood furniture and the coating usage for the plastic coating process is greater than 100 gallons/yr, this source will be subject to the NESHAP for Surface Coating of Plastics Parts and Products (40 CFR 63, Subpart PPPP), pursuant to 40 CFR 63.4481. Since the Permittee proposed to perform the plastic coating using the existing wood coating booths, which were constructed before December 4, 2002, this source is considered an existing source under 40 CFR 63, Subpart PPPP, pursuant to 40 CFR 63.4482(c). Therefore, the Permittee would need to comply with the requirements in 40 CFR 63, Subpart PPPP no later than August 29, 2006, pursuant to 40 CFR 63.4483(b).

The source also proposed to limit the HAP emissions to less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination of HAPs when performing the plastic coating operations. Since the existing source is a HAP major source, limiting the HAP emissions from the plastic coating operations will not make this source exempt from the requirements of 40 CFR 63, Subpart PPPP.

In summary, the proposed plastic coating operations would be subject to 40 CFR 63, Subpart PPPP, and using the existing wood coating booths for the plastic coating operations is considered a change in the method of operation. Therefore, the proposed modification would need to be permitted as a Part 70 Minor Source Modification, pursuant to 326 IAC 2-7-10.5(d)(6), and a Part 70 Significant Permit Modification, pursuant to 326 IAC 2-7-12(d).



Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this review request to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ERG/YC

cc: File - Spencer County
U.S. EPA, Region V
Spencer County Health Department
Southwest Regional Office
Air Compliance Section Inspector - Scot Anslinger
Compliance Data Section - Karen Ampil
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner